

HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SUSAN CHEN, ET AL.,

Plaintiffs,

vs.

NATALIE D'AMICO, et al.,

Defendants.

CIVIL ACTION NO. 16-cv-01877-JLR

**STIPULATION AND PROPOSED  
ORDER TO EXTEND CASE  
DEADLINES**

**Note on Motion Calendar:  
August 14, 2017**

Plaintiff Susan Chen and Defendant Natalie D'Amico, and Defendant City of Redmond (the only defendants to have appeared in this action) (collectively, the "Parties") hereby submit this Stipulated Motion to Extend Case Deadlines ("Stipulated Motion") to extend by 60 days the deadlines stated in the Court's Order of July 5, 2017 (ECF No. 20).

The Parties stipulate and agree that in view of the recent appointment of pro bono counsel for Plaintiff Chen, the recent addition of new defendants in the Amended Complaint filed on August 9, 2017 (ECF No. 21), the time needed to effectuate service of process on the new defendants, and the need to meet and confer with these new defendants in planning discovery and case scheduling, the Parties stipulate and agree that there is good cause to extend by 60 days

STIPULATION AND ORDER TO EXTEND CASE  
DEADLINES - 1  
16-cv-01877-JLR

**DORSEY & WHITNEY LLP**  
COLUMBIA CENTER  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8800  
FAX: (206) 903-8820

1 all deadlines stated in the Court's Order of July 5, 2017.<sup>1</sup>

2 Defendants do not waive any defenses by agreeing to the terms of this Stipulated Motion.

3 **NOW THEREFORE**, the Parties jointly move the Court for entry of the Proposed Order  
4 below to extend case deadlines.

5 Stipulated and respectfully submitted this 14<sup>th</sup> day of August, 2017.

6 **DORSEY & WHITNEY LLP**

7  
8 By: /s/Shawn Larsen-Bright

9 Shawn Larsen-Bright, WSBA # 37066

10 T. Augustine Lo, WSBA # 48060

11 701 Fifth Avenue, Suite 6100

12 Seattle, WA 98104

13 Tel. 206-903-8825

14 larsen.bright.shawn@dorsey.com

15 lo.augustine@dorsey.com

16 *Attorneys for Plaintiff Susan Chen*

17 **OGDEN MURPHY WALLACE, PLLC**

18 By: /s/Aaron P. Riensche, per email auth.

19 Aaron P. Riensche

20 Geoff Bridgman

21 901 Fifth Avenue, Suite 3500

22 Seattle, WA 98164

23 Tel. 206-447-7000

24 ariensche@omwlaw.com

25 gbridgman@omwlaw.com

*Attorneys for Defendants Natalie D'Amlco  
and City of Redmond*

1 Co-Plaintiff Naixiang Lian indicated by email on August 11, 2017 that he does not object to this proposed extension.

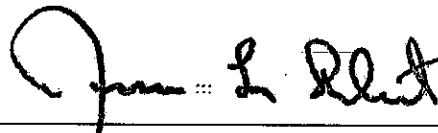
**PROPOSED ORDER**

The Court, having considered the Stipulated Motion to Extend Case Deadlines, and finding good cause to extend case deadlines by 60 days, hereby **ORDERS** a 60 day extension of the deadlines stated in the Court's Order of July 5, 2017, as follows:

1. Fed. R. Civ. P. 26(f) Conference Deadline: October 16, 2017
2. Initial Disclosure Deadline: October 23, 2017
3. Joint Status Report Due: October 30, 2017

**IT IS SO ORDERED.**

Dated this 15<sup>th</sup> day of August, 2017

  
Hon. James L. Robart  
United States District Judge

Presented by:

DORSEY & WHITNEY LLP

/s/Shawn Larsen-Bright

Shawn Larsen-Bright, WSBA # 37066  
T. Augustine Lo, WSBA # 48060  
701 Fifth Avenue, Suite 6100  
Seattle, WA 98104  
Tel. 206-903-8825  
larsen.bright.shawn@dorsey.com  
lo.augustine@dorsey.com

*Attorneys for Plaintiff Susan Chen*

STIPULATION AND ORDER TO EXTEND CASE  
DEADLINES - 3  
16-cv-01877-JLR

**DORSEY & WHITNEY LLP**  
COLUMBIA CENTER  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8800  
FAX: (206) 903-8820

1 OGDEN MURPHY WALLACE, PLLC

2  
3 /s/Aaron P. Riensche, per email auth.

4 Aaron P. Riensche

5 Geoff Bridgman

6 901 Fifth Avenue, Suite 3500

7 Seattle, WA 98164

8 Tel. 206-447-7000

9 ariensche@omwlaw.com

10 gbridgman@omwlaw.com

11 *Attorneys for Defendants Natalie D'Amico*  
12 *and City of Redmond*

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

222 2 - P

STIPULATION AND ORDER TO EXTEND CASE  
DEADLINES - 4  
16-cv-01877-JLR

DORSEY & WHITNEY LLP  
COLUMBIA CENTER  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8300  
FAX: (206) 903-8820

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

Aaron P. Riensche Geoff Bridgman Ogden Murphy Wallace, P.L.L.C. 901 Fifth Avenue, Suite 3500 Seattle, Washington 98164 Tel: 206-447-7000 ariensche@omwlaw.com gbridgman@omwlaw.com  Attorneys for Defendant Natalie D'Amico	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via ECF Notification
Naixiang Lian PO BOX 134 Redmond, Washington 98073	<input type="checkbox"/> Via Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via ECF Notification

Dated this 14<sup>th</sup> day of August, 2017.

/s/Natasha Johnston

Natasha Johnston, Legal Assistant

STIPULATION AND ORDER TO EXTEND CASE  
DEADLINES - 5  
16-cv-01877-JLR

**DORSEY & WHITNEY LLP**  
COLUMBIA CENTER  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8800  
FAX: (206) 903-8820

